

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	: <b><u>ECF CASE</u></b>
IN RE AMERICAN INTERNATIONAL	:
GROUP, INC. SECURITIES LITIGATION	: Master File No. 04 Civ. 8141 (DAB) (AJP)
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This Document Relates To: All Actions	:
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**REPLY DECLARATION OF THOMAS A. DUBBS IN FURTHER SUPPORT OF  
MOTIONS FOR APPROVAL OF PROPOSED SETTLEMENT WITH  
DEFENDANT AMERICAN INTERNATIONAL GROUP, INC. AND AWARD OF  
ATTORNEYS' FEES AND EXPENSES**

THOMAS A. DUBBS, Esq., declares as follows pursuant to 28 U.S.C. §1746:

1. I am a Senior Partner of the law firm of Labaton Sucharow LLP ("Labaton Sucharow"), Court-appointed Lead Counsel for the Ohio Public Employees Retirement System ("OPERS"), State Teachers Retirement System of Ohio ("STRS Ohio"), and Ohio Police & Fire Pension Fund ("OP&F") (collectively, "Lead Plaintiff" or the "Ohio State Funds"), and the Settlement Class in the above-titled action (the "Action"). I am admitted to practice before this Court.

2. I respectfully submit this declaration in support of Lead Plaintiff's motion, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for final approval of the Settlement of this class action with respect to Defendant American International Group, Inc. ("AIG" or the "Company"), and certain related defendants, and the proposed Plan of Allocation. I also submit this declaration in support of Lead Counsel's motion for an award of attorneys' fees and reimbursement of counsel's expenses incurred during the prosecution of this Action and Lead Plaintiff's application for reimbursement of its reasonable costs and expenses directly relating to the representation of the Settlement Class, pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. §78u-4 (a)(4).

3. Annexed hereto as Exhibit 1 is the Supplemental Affidavit of Eric J. Miller, dated January 12, 2012, of Rust Consulting, Inc., with attached exhibits.

4. Annexed hereto as Exhibit 2 is a summary table prepared by my office concerning prior objections in class actions submitted by counsel for the Rinis/Rothstein objectors, as well as by Rinis Travel Service Inc., Michael J. Rinis, and attorney Steve A. Miller.

5. Annexed hereto as Exhibit 3 are true and correct copies of two class action settlement notices disseminated to the class in *In re Veritas Software Corp., Sec. Litig.*, No. 03-0283 (N.D. Cal.), both before the appeal to the United States Court of Appeals for the Ninth Circuit and after.

6. Annexed hereto as Exhibit 4 is a true and correct copy of the Brief for Plaintiffs-Appellees Ohio State Funds, dated August 5, 2011, submitted to the United States Court of Appeals for the Second Circuit in connection with the Rothstein's appeal of the prior settlement with former defendant PricewaterhouseCoopers LLP.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 13, 2012.

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/s/ Thomas A. Dubbs  
THOMAS A. DUBBS